

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

OMAR HURLOCK, on behalf of himself
and all others similarly situated,

Plaintiff,

vs.

Case No. 1-25-cv-03891 (JLR)

KELSIER VENTURES, KIP PROTOCOL,
HAYDEN DAVIS, GIDEON DAVIS,
METEORA, THOMAS DAVIS, JULIAN
PEH, and BENJAMIN CHOW,

Defendants.

DECLARATION OF M. CRIS ARMENTA

Pursuant to 28 U.S.C. § 1746, I, M. Cris Armenta, declares under penalty of perjury that the following is true and correct.

1. I am an attorney duly admitted to practice law in the State of California and am one of the attorneys of record for Defendant Hayden Davis in the above-captioned matter. Simultaneously with the filing of this Declaration, I have submitted a Motion to Appear *Pro Hac Vice* in this case.

2. I submit this Declaration in support of the Motion for an Order Dissolving the Temporary Restraining Order Entered on May 29, 2025, and in opposition to the issuance of a preliminary injunction.

3. Attached as **Exhibit A** is a true and correct copy of the transcript of hearing for the hearing held in this matter on May 27, 2025.

4. Attached as **Exhibit B** is a true and correct copy of a Press Release dated May 30, 2025, titled “The Treanor Law Firm Obtains Emergency Freeze of As Much as \$280 Million in \$LIBRA Cryptocurrency Scam,” which I obtained at the following url: <https://treanor-law.com/wp-content/uploads/2025/05/LIBRA-Asset-Freeze-Press-Release-5-30-25.pdf>

5. Attached as **Exhibit C** is a true and correct copy of a news report published on June 9, 2025, titled “Argentine Anti-Corruption Office Clears President in LIBRA Memcoin Scandal, previously located at <https://www.bitget.com/news/detail/12560604804353>, but which appears to be no longer accessible.

Dated: June 24, 2025

/s/ M. Cris Armenta
M. Cris Armenta